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September 9, 2020

VIA ECF

Hon. Michael A. Shipp, U.S.D.J.
United States District Court, District of New Jersey
Clarkson S. Fisher Federal Building & U.S. Courthouse
402 E. State Street, Room 5000
Trenton, NJ 08608

**Re: *In re Valeant Pharmaceuticals Int'l, Inc. Sec. Litig.*,
Case No. 3:15-cv-07658-MAS-LHG (D.N.J.)**

Dear Judge Shipp:

We write on behalf of Plaintiff City of Tucson, together with and on behalf of the Tucson Supplemental Retirement System (“Plaintiff”), with respect to PricewaterhouseCoopers LLP’s (“PwC”) Objection to the Special Master’s Report & Recommendation on Tucson’s Motion for Leave to Amend (ECF No. 609). Plaintiff has opposed the Objection (ECF No. 614) and PwC has replied (ECF No. 615). Pursuant to Local Rule 7.1(d)(6), Plaintiff respectfully requests leave to file a short sur-reply to address two cases cited for the first time by PwC in its reply. Specifically, despite PwC having submitted two prior briefs on this issue, its reply takes language out of context from two decisions from this District that were issued roughly ten years ago yet not cited by PwC in its previous briefs. Plaintiff therefore respectfully requests permission to file the attached sur-reply so that the Court may have a full, fair, and complete record before ruling on PwC’s Objection.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Christopher A. Seeger". The signature is stylized with a large, sweeping loop at the end.

Christopher A. Seeger
Local Counsel for Plaintiff

Encl.

cc: Counsel of Record by ECF